

Company Name _____

EPA ID# No. _____

Region/Inspector _____

Inspection Date _____

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

APPENDIX L

Universal Waste Checklist

A. Standards for SQ Handlers and LQ Handlers of Universal Waste:

1. ____ The universal waste is not disposed, diluted or treated on site ____
by the handler - 374-3.2(b)/374-3.3(b).
2. ____ A Large quantity handler of universal waste must notify the ____
EPA Regional Administrator in writing about universal waste
management unless he has already notified EPA of his hazardous
waste management activities and has received an EPA Identification
Number - 374-3.3(c).
3. Waste Management Requirements: 374-3.2(d)/374-3.3(d)
(a) Universal Waste Batteries:
 - (i) ____ The handler must contain universal waste batteries in a ____
container that is closed, structurally sound, compatible
with the contents, and must lack evidence of leakage, spillage,
or damage - 374-3.2(d)(1)(i)/374-3.3(d)(1)(i).
 - (ii) ____ A handler may conduct the activities such as, sorting, ____
mixing, discharging, regenerating, disassembling, and
removing of batteries from the product, as long as the
battery cell is not breached and remains intact and
closed - 374-3.2(d)(1)(ii)/374-3.3(d)(1)(ii).
 - (iii) ____ A handler who removes electrolyte from batteries, must ____
determine whether electrolyte and/or other solid waste
exhibit any characteristic of hazardous waste, and if so,
it should be handled accordingly - 374.3.2(d)(1)(iii)/
374-3.3(d)(1)(iii)

(b) Universal Waste Pesticides:

Does the waste pesticides meet the criteria of 374-3.1(c) to be universal waste? Yes ____ No ____

Please Explain: _____

- (i) ____ The handler must contain universal waste pesticides in ____ a container that remains closed, structurally sound, compatible with the contents and must lack evidence of leakage, spillage or damage - 374-3.2(d)(2)(i)/374-3.3(d)(2)(i).
- (ii) ____ A tank that meets the requirements of section 373-3.10, ____ except for subdivision 373-3.10(h)(3), 373-3.10(k) & (l), should be used to manage universal waste pesticides - 374.3.2(d)(2)(iii)/374-3.3(d)(2)(iii).

(c) Universal Waste Thermostats:

- (i) ____ Any universal waste thermostat that shows evidence of ____ leakage, spillage or damage must be contained in a container that is closed, structurally sound, and compatible with the contents - 374-3.2(d)(3)(i)/374-3.3(d)(3)(i).
- (ii) ____ A handler may remove mercury-containing ampules from waste ____ thermostats provided that the requirements (a)-(h) of this section are met - 374-3.2(d)(3)(ii)/374-3.3(d)(3)(ii).
- (iii) ____ A handler who removes mercury-containing ampules from ____ waste thermostats, must determine whether the mercury, or clean-up residues and/or other solid waste exhibit any characteristic of hazardous waste, and if so, it should be handled accordingly - 374-3.2(d)(3)(iii)/374-3.3(d)(3)(iii).

4. Labeling/Marking Requirement:

- (a) ____ A container in which the batteries are stored or the waste ____ batteries must be marked clearly with "Universal Waste - batteries" or "Waste batteries" or "Used batteries" - 374-3.2(c)(1)/374-3.3(e)(1).
- (b) ____ A container, tank or transport vehicle containing waste ____ pesticides must be marked clearly with the label that was on the product and the words "Universal waste - Pesticides" or "Waste pesticides" - 374-3.2(e)(2) & (3)/374-3.3(e)(2) & (3).
- (c) ____ A container in which the thermostats are stored or a waste ____ thermostat, must be marked clearly with "Universal Waste-Mercury thermostats" or "Waste Mercury thermostats" or "Used Mercury-thermostats" -374.3.2(e)(4)/374-3.3(e)(4).

5. Accumulation Time Limits:

- (a) ____ The universal waste is not accumulated over a year from the ____ date the waste is generated, or received - 374-3.2(f)(1)/374-3.3(f)(1). OR
- (b) ____ The accumulation of universal waste for longer than one year ____ is allowed, if the handler properly demonstrates that such

accumulation is necessary to facilitate proper recovery, treatment, or disposal - 374-3.2(f)(2)/374-3.3(f)(2).

(c)___ A handler must be able to demonstrate the length of time that ___ the universal waste has been accumulated by marking the date, maintaining an inventory, or any other method - 374-3.2(f)(3)/374-3.3(f)(3).

6. ___ A handler must inform all employees, who handle the universal waste, about the proper handling and emergency procedure - 374-3.2(g)/374-3.3(g).

7. ___ A handler of universal waste is prohibited from sending or taking ___ universal waste to a place other than universal waste handler, or a destination facility - 374-3.2(i)(1)/374-3.3(i)(1).

8. ___ When the universal waste is being transported off-site, by the ___ handler or other transporter, the requirements of Part 364 must be met - 374-3.2(i)(2)/374-3.3(i)(2). (Note: Shipments less than 500 pounds are exempt from Part 364, see 364.1(e)(3)(ii)).

9. ___ A large quantity handler of universal waste must keep a record of ___ each shipment of universal waste to and/or from the facility (i.e. a log, invoice, bill of lading, etc.). The records must be retained for at least three years from the date of the shipment - 374-3.3(j).

B. Standards for Universal Waste Transporter:

___ A universal waste transporter must comply with the requirements of ___ 374-3.4(b) to (g).

C. Standards for Destination Facility of Universal Waste:

1. ___ The owner or operator of a destination facility that recycles a ___ particular universal waste without storing that waste before it is recycled must comply with 371.1(g)(3)(ii) requirements of this title - 374-3.5(a)(2).

2. ___ The destination facility of universal waste is prohibited from ___ sending or taking universal waste to a place other than universal handler or a destination facility - 374-3.5(b)(1).

3. ___ The destination facility must keep a record of each shipment of ___ universal waste to and/or from the facility (i.e. a log, invoice, bill of lading, manifest, etc.). The records must be retained for at least three years from the date of the shipment - 374.3.5(c).